



Theresa Kleinhaus &lt;tess@loevy.com&gt;

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**Terry v. Count of Milwaukee**

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**Theresa Kleinhaus** <tess@loevy.com>

Tue, Mar 13, 2018 at 11:41 AM

To: Douglas Knott &lt;dknott@lkglaw.net&gt;

Cc: "Russart, Michael P" &lt;mrussart@hinshawlaw.com&gt;, Cory Brewer &lt;cbrewer@lkglaw.net&gt;, "Kugler, Mollie T." &lt;MKugler@hinshawlaw.com&gt;, Aisha Davis &lt;aisha@loevy.com&gt;, Scott Rauscher &lt;scott@loevy.com&gt;

Doug,

Please advise when Plaintiff can expect to receive the supplemental interrogatory responses and verifications from Defendants Hoover and Exum, as well as the discovery the Court ordered in Dkt. No. 59.

Thanks,

Tess

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## Terry v. Count of Milwaukee

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**Scott Rauscher** <scott@loevy.com>  
To: Theresa Kleinhaus <tess@loevy.com>  
Cc: Douglas Knott <dknott@lkglaw.net>, "Russart, Michael P" <mrussart@hinshawlaw.com>, Cory Brewer <brewer@lkglaw.net>, "Kugler, Mollie T." <MKugler@hinshawlaw.com>, Aisha Davis <aisha@loevy.com>

Wed, Mar 21, 2018 at 5:20 PM

Doug,

I don't believe we received a response to Tess's below emails. I saw that today you filed a motion for judgment on the pleadings today, and asked for alternative relief to limit discovery. So that we can make sure we are on the same page, does your client intend to comply with the Court's order on Plaintiff's motion to compel while the motion for judgment on the pleadings is pending? If so, please let us know when your client will be producing responsive documents. Thanks, and feel free to give me a call to discuss.

Scott

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Scott Rauscher  
Loevy & Loevy  
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Chicago, IL 60607  
O: 312.243.5900  
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## Terry v. County of Milwaukee; Defendants' Overdue Document Responses

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Theresa Kleinhaus <tess@loevy.com>

Tue, Apr 3, 2018 at 1:19 PM

To: Douglas Knott <dknott@lkglaw.net>, "Russart, Michael P" <mrussart@hinshawlaw.com>

Cc: Aisha Davis <aisha@loevy.com>, Scott Rauscher <scott@loevy.com>, "Kugler, Mollie T." <MKugler@hinshawlaw.com>,

Cory Brewer <cbrewer@lkglaw.net>, Ann Schaar <aschaar@lkglaw.net>, Abraham Corrigan <abraham@loevy.com>

Mike and Doug:

Please let us know when you will produce the documents and discovery responses the Court ordered produced in its Orders of March 5, 2018, Dkt. No. 59 (Order compelling discovery from Milwaukee County Defendants) and March 21, 2018, Dkt. No. 76 (Order compelling discovery from Armor). We will seek the Court's intervention if these compelled materials are not provided promptly.

In addition, please immediately provide responses to Plaintiff's Second & Third Set of Requests for Production which are overdue. Many of the documents responsive to those requests are relevant to depositions taking place this week and we are not willing to permit any further delays.

Doug, we asked you in our email dated March 14, 2018 whether you checked for any video from the date of the incident. Please respond to that request. Likewise, we have asked for any supervisor's report (perhaps called a Major Incident Report), please respond to that request.

In addition, Defendant Wenzel testified that he has training materials at home. Those documents are responsive to Plaintiff's Request for Production No. 5 in Plaintiff's First Set of Requests for Production and should have been previously produced (before the defendant's deposition). Please produce those documents promptly.

Please produce the MCJ SMU policy in operation in March 2014. The one we have, bates-labeled Terry20052-55 was produced by the County in the *Martin* litigation, but you have never provided the policy in place in March 2014. It is responsive to Plaintiff's RFP No. 20 in Plaintiff's First Set of Requests for Production.

Please produce the MCJ Logs, Records, and Reports policy in operation in March 2014. The one we have, bates-labeled Terry19919-21 was produced by the County in the *Martin* litigation, but you have never provided the policy in place in March 2014. It is responsive to Plaintiff's No. 20 in Plaintiff's First Set of Request for Production.

Tess